

EXHIBIT 1

1 NBHJSECH

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 -----x3 SECURITIES AND EXCHANGE
4 COMMISION,

5 Plaintiff,

6 v.

6 23 Civ. 1346 (JSR)

7 TERRAFORM LABS PTE LTD., ET
8 AL.,

8 Hearing

9 Defendants.

10 -----x
11 New York, N.Y.
12 November 17, 2023
13 2:00 p.m.

14 Before:

15 HON. JED S. RAKOFF,

16 District Judge

17 APPEARANCES

18 U.S. SECURITIES AND EXCHANGE COMMISSION
19 Attorneys for Plaintiff
20 BY: CHRISTOPHER J. CARNEY
21 JAMES P. CONNOR
22 LAURA E. MEEHAN23 DENTONS US LLP
24 Attorneys for Defendants Do Hyeong Kwon and Terraform Labs
25 BY: DOUGLAS W. HENKIN
LOUIS A. PELLEGRINO, III
MARK CALIFANO
MATTHEW A. LAFFERMAN
DAVID L. KORNBLAU

26 Also Present:

27 Elliott Bacon, Katten Muchin Rosenman
28 Sarah Gonzalez, Paralegal

NBHJSECH

Unny - Direct

3 | DIRECT EXAMINATION

4 BY THE COURT:

5 THE COURT: So again, thank you for being here.

6 I'm sure it's somewhere in your report - it was in all
7 the other reports, but I may have missed it somehow. How much
8 are you being compensated for your expert work here?

9 THE WITNESS: Yes, your Honor.

10 As stated, in my first report, it's -- the
11 compensation is \$950.

16 So you heard the colloquy, and I guess one of the
17 questions is, since you weren't personally doing the underlying
18 processing of the data, what kind of supervision did you
19 exercise and how did you exercise it?

20 THE WITNESS: Yes, your Honor.

21 So Cornerstone research is a data analytics company,
22 and the data was provided to us with Mr. Edman's report and it
23 was in a format called JSON. And so I had Cornerstone extract
24 the data from the JSON data set and put it into a standardized
25 SQL database. And then --

NBHJSECH

Unny - Direct

1 THE COURT: What kind of data are we talking about?

2 THE WITNESS: There is the data that Mr. Edman was
3 given by some consultant. He's not named, the consultant, but
4 it was the data that was extracted, as I understand it, from
5 Terra blockchain.

6 THE COURT: But that's part of my question. I
7 understand what you just said, whether this was all the data,
8 partial data, whether it was extracted through proper
9 methodology or from skewed methodology, you just took it as
10 given to you, yes?

11 THE WITNESS: I did verify the scripts that Dr. Edman
12 provided in terms of how they extracted it. And there is a
13 service called Terra Finder where you can query the Terra
14 blockchain directly, and I did run a few queries to make sure
15 the data was matching after we extracted it to the SQL
16 database.

17 THE COURT: Now, did you limit yourself to Dr. Edman's
18 data?

19 THE WITNESS: I tried to, your Honor, because that's
20 the data that he uses to make his opinions.

21 THE COURT: And you concluded that it wasn't
22 sufficient to substantiate his opinions; do I have that right?

23 THE WITNESS: Correct.

24 THE COURT: And so you're not saying his opinions are
25 necessarily wrong, you're saying that you can't tell whether